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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RICHARD M. RIEHL

December 23, 1993

William F. Caton
Secretary
Federal Communications Commission
Washington, D.C. 20554

Our File No.
1124-102-63

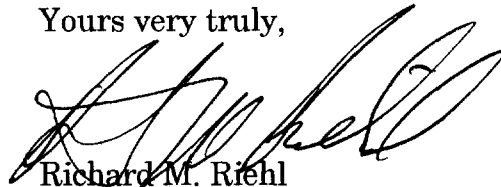
RE: MM Docket No. 93-269
Pilot Point and Denison, Texas

Dear Mr. Caton:

On behalf of the Davis Family Trust please find enclosed an original and four copies of its Comments of Davis Family Trust and an original and four copies of a covering Motion to Accept Late Filed Comments. For the reasons stated in the Comments and attached Petition for Rule Making, expedited resolution of this Proceeding is also requested.

Kindly communicate any questions directly to this office.

Yours very truly,



Richard M. Riehl

Enclosures

RMR/das

cc: Ms. Pamela Blumenthal (Rm. 8308)

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Before The
Federal Communications Commission
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of)

Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations,)

Pilot Point and Denison)
Texas)

MM Docket No. 93-269
RM No. 8318

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: Chief, Mass Media Bureau

**MOTION TO ACCEPT LATE FILED
COMMENTS**

Comments in the above-captioned proceeding were due to be filed on December 20, 1993. Due to the press of other business counsel inadvertently failed to submit the accompanying Comments of Davis Family Trust, the proponent of the reallocation, on the due date. Once the omission was discovered, steps were taken to immediately rectify the error.

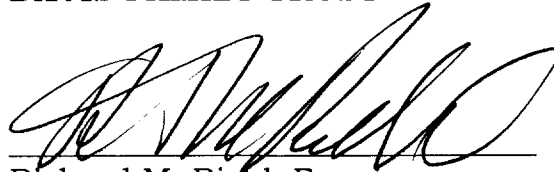
Moreover, this is a proceeding initiated pursuant to Section 1.420(i) of the Rules which, by its terms, required the present and proposed allocations to be mutually exclusive. As a consequence, no other expressions of interest or counter proposals can be entertained. Additionally, no opposing Comments have been served on undersigned counsel.¹

¹ No adverse comments should be expected. Sherman-Denison is a financially distressed radio market. KTCY was acquired out of bankruptcy after being silent for two years. Stations KJIM(AM) and KWSM(FM) are in receivership and Station KLAQ(FM) is also in bankruptcy.

Inasmuch as the failure to timely file the Comments of Davis Family Trust was inadvertent, acceptance of them will not adversely affect any party and will conserve the Commission's limited resources, good cause, it is submitted, has been shown. The Commission is therefore requested to accept the accompanying Comments of Davis Family Trust for consideration in this proceeding.

Respectfully submitted,

DAVIS FAMILY TRUST

A handwritten signature in black ink, appearing to read 'R. M. Riehl', is written over a horizontal line.

Richard M. Riehl, Esquire
Its Attorney

HALEY, BADER & POTTS
4350 North Fairfax Drive
Suite 900
Arlington, VA 22203-1633
703/841-0606

December 23, 1993

Before The
Federal Communications Commission
 Washington, D.C. 20554

In the Matter of)

Amendment of Section 73.202(b))

Table of Allotments)

FM Broadcast Stations,)

Pilot Point and Denison)

Texas)

MM Docket No. 93-269

RM No. 8318

TO: Chief, Mass Media Bureau

COMMENTS OF DAVIS FAMILY TRUST

Davis Family Trust ("DFT") licensee of Station KTCY(FM) Channel 285A¹ Denison, Texas and proponent to change the community of license of Station KTCY from Denison to Pilot Point, Texas, by its attorneys and pursuant to the Notice of Proposed Rule Making ("NPRM") (DA 93-1193) released October 28, 1993 in the above-captioned matter, hereby submits its Comments in support of the reallocation of Channel 285C2 from Denison to Pilot Point, Texas.² In support of these Comments, the following is respectfully submitted:

DISCUSSION

In its Petition for Rule Making, DFT demonstrated that Channel 285C2 could be reallocated from Denison to Pilot Point, Texas with

¹ KTCY has an outstanding Construction Permit for Class C2 facilities. However, the transmitter location is different than the proposed reference coordinates for Pilot Point. Consequently, upon a grant of this Petition, that Construction Permit will be modified.

² These Comments, through inadvertence, are being submitted three days late. A Petition to accept late filed Comments accompanies this submission.

allocation coordinates of North 33-32-30 and West 96-57-15 in full compliance with all of the Commission's allocation rules and policies. In addition, DFT demonstrated, as required by Section 1.420(i) of the Rules, that the objectives of 47 U.S.C. § 307(b) would be furthered in that the reallocation of Channel 285C2 would bring a first local service to Pilot Point, an established community of more than 2,500 persons, while leaving Denison with a full time AM and FM station and the Denison-Sherman market with six stations five of which are fulltime.³ The Petition further demonstrated that the present and proposed allocations are mutually exclusive. As authorized in the NPRM (Appendix), DFT's Petition for Rule Making is hereby incorporated by reference and a copy is attached to and made a part of these Comments.

The Commission is therefore urged to amend the Table of Allotments (73.202(b) of the Rules) as follows:

<u>CITY</u>	<u>ALLOCATION</u>
Pilot Point, Texas	285C2 ⁴
Denison, Texas	269C3 ⁵

and to modify license of Station KTCY to specify Pilot Point, Texas as its licensed community. In the event this request is granted, DFT will promptly file an application to modify KTCY's existing facilities to comply

³ Denison and Sherman are contiguous communities and are regarded locally and by Arbitron as a single market. The Commission has also long recognized these communities as a single entity for allocation purposes. See, 4 FCC Rcd 8147 (MMB 1989) and 5 FCC Rcd 6653 (1990) (The initial allocation of Channel 269 was to Denison-Sherman).


⁴ In order to meet spacing requirements a site restriction at approximately North 33° 32' 20", West 96° 57' 15" is necessary.

⁵ The NPRM (Note 1) incorrectly credited Denison with station KIKM (Channel 244A) rather than KDSQ (Channel 269C3) as well as KTCY.

with the proposed reference coordinates for the allocation of Channel 285C2 at Pilot Point.⁶

Respectfully submitted,

DAVIS FAMILY TRUST


Richard M. Riehl, Esquire
Its Attorney

HALEY, BADER & POTTS
4350 North Fairfax Drive, Suite 900
Arlington, VA 22203-1633
703/841-0606

December 23, 1993

⁶ The suggested reference point and site restriction, North 33° 32' 20", West 96° 57' 15", is necessary to satisfy the separation requirements with Station KWNS (Ch. 285A), Winboro, Texas, Station KKDA (Ch. 283C), Dallas, Texas and Station KYYI (Ch. 284C), Burkburnett, Texas. (Attachment A, p. 2)

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FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE SECRETARY

RICHARD M. RIEHL

August 16, 1993

William F. Caton
Secretary
Federal Communications Commission
Washington, D.C. 20554

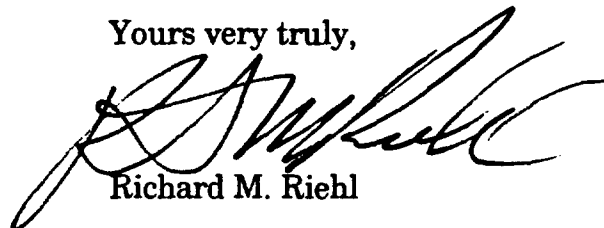
RE: Petition for Rule Making (73.202(b))
Pilot Point and Denison, Texas

Dear Mr. Caton:

On behalf of Davis Family Trust please find enclosed an original and four copies of its Petition for Rule Making. For the reasons stated in the Petition for Rule Making, Expedited consideration of this Petition is also requested.

Kindly communicate any questions directly to this office.

Yours very truly,



Richard M. Riehl

Enclosures (5)

RMR/das

Before The
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No.
Table of Allotments)	RM No.
FM Broadcast Stations,)	
)	
Pilot Point and Denison)	
Texas)	

TO: Chief, Mass Media Bureau

PETITION FOR RULE MAKING

Davis Family Trust ("DFT") licensee of Station KTCY(FM) Channel 285A¹ Denison, Texas, by its attorneys and pursuant to Section 307(b) of the Communications Act and Section 1.420(i) of the Rules, hereby requests the Commission to amend the FM Table of Allotments (Section 73.202(b) of the Rules) as follows:

<u>CITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Pilot Point, Texas	<u>NONE</u>	285C2 ²
Denison-Sherman, Texas ³	244A, 269C3, 281A 285C2	244A, 269C3, 281A

In support of this request, the following is respectfully submitted:

¹ KTCY has an outstanding Construction Permit for Class C2 facilities. However, the transmitter location is different than the suggested reference point for Pilot Point. Consequently, upon a grant of this Petition, that construction permit will be modified.

² In order to meet spacing requirements a site restriction at approximately North 33° 32' 20", West 96° 57' 15" is necessary (See Attachment A, p.2).

³ Denison-Sherman is generally regarded as a single market area. According to Section 73.202(b) of the Rules, 1 FM Station is assigned to Denison-Sherman, 1 is allocated to Denison and 2 are allocated to Sherman.

BACKGROUND

Station KTCY was recently acquired by DFT out of bankruptcy. The Station had been unable to survive economically in the Denison-Sherman market and, in fact, until very recently has been off the air for over two years.

DFT has concluded that changing KTCY's community of license to Pilot Point, Texas is essential to its successful survival.⁴ In this regard, while KTCY has recently been returned to the air in fulfillment of a condition imposed by the Commission in the assignment application. It is operating with its licensed Class A facilities and is duplicating the programming of another FM station in the market until authorization to change the community of license is granted by the Commission. To do otherwise would have required DFT to establish KTCY's presence in the Denison-Sherman market on a very short term basis, only to withdraw such service upon approval of this request. The cost of establishing KTCY in two locations in a relatively short period of time would be prohibitively expensive and the people in Denison-Sherman, it is believed would be better served by not initiating a new voice that would be withdrawn in the near future. DFT does, however, ask for expedited consideration of this request so that a service unique to the area and designed to serve the needs and interests of Pilot Point can be implemented as soon as possible.

⁴ As discussed in more detail *infra.*, there are currently four FM and three AM stations assigned to the Denison-Sherman market. In fact, Channel 269C3 is listed in 73.202(b) as a Denison-Sherman allocation.

DISCUSSION

Section 1.420(i) of the Rules authorizes the Table of Allotments to be amended and modification of the license of an FM station to specify a new community of license where the amended allotment would be mutually exclusive with the present assignment. However, the Commission has emphasized that such changes in the Table of Allotments must satisfy the objectives of 47 USC § 307(b):

“...To insure that our intent is clear, however, we hereby state unequivocally that Section 1.420(i) was adopted to further the Commission's long standing pursuit of the goals underlying Section 307(b) of the Act, and that any changes in the FM and TV Tables of Allotments must be consistent with those goals.”

Modification of FM & TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7894, 7895 (1990) on reconsideration (“Recon. Order”). This proposed change in allotments satisfies all of the criteria and objectives.

MUTUAL EXCLUSIVITY

According to DFT's Technical Consultant, Lyndon H. Willoughby, the proposed allocation of Channel 285C2 to Pilot Point, Texas, is mutually exclusive with present allocation of the Channel to Denison, Texas (Attachment A, pp. 1 and 2).⁵

⁵ Mr. Willoughby's statement is included as Attachment A hereto. Attachment A, Exhibit A, p. 2 reflects a distance of 40.2 kilometers between KTCY's licensed facilities and the suggested Pilot Point reference point whereas the required spacing between co-channel Class C2 allotments is 190 kilometers.

307(b) MANDATE IS SATISFIED

First Local Service for Pilot Point

This proposed change in the Table of Allotments will bring Pilot Point its first local service. Pilot Point is an incorporated community with a population of 2,588. It has a mayor/city counsel form of government and has its own police department, school system, library and the City Pilot Point also provides other municipal type services to its residents. (Attachment A, p. 2)

Six Local Services Will Remain In Denison-Sherman

There are currently seven stations assigned to the Denison-Sherman market.⁶ Allotment of Channel 285C2 to Pilot Point will leave the following local services:

Community	Call	Chan/Freq	Facility
Denison/Sherman	KDSQ-FM	Ch 269	Class C3
Denison	KDSX(AM)	950 kHz	0.5kw.DA-U
Sherman	KIKM(FM)	Ch 244	Class A
Sherman	KWSM(FM)	Ch 281	Class A
Sherman	KXEB(AM)	910 kHz	1.0kw.DA-U
Sherman	KJIM(AM)	1500 kHz	1.0kw.DA-D

Attachment A, p. 2.

⁶ Denison and Sherman are contiguous communities and are regarded locally and by Arbitron as a single market. The Commission has also long recognized these communities as a single entity for allocation purposes. See, 4 FCC Rcd 8147 (MMB 1989) and 5 FCC Rcd 6653 (1990) (The initial allocation of Channel 269 was to Denison-Sherman).

Section 307(B) Mandates The Pilot Point Allotment

In emphasizing that every proposed change in the community of license in the Table of Allotments must satisfy the mandate of 307(b) of the Act, the Commission concluded that:

"... provision of a first local service is the highest of our allotment priorities which remains in any significant degree unsatisfied."

Recon. Order, 5 FCC at 7896, para. 16. This proposed change in the Table satisfies this highest of current priorities while leaving Denison-Sherman with six stations and Denison, if viewed separately, with two full time stations. Finally, it is also worth noting that this is not a case of attempting to move an allotment closer to a nearby urban area. This proposal is to move the allotment 40 kilometers away from the Denison-Sherman MSA.

CONCLUSION

The foregoing establishes that the requirements of Section 1.420(i) of the Rules are satisfied and that this requested change in the Table of Allotments will further the objectives of Section 307(b) of the Act. The Commission is therefore requested to issue a Notice of Proposed Rule

Making to change the Table of Allotments (73.202(b) of the Rules) as follows:

<u>CITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Pilot Point, Texas	<u>NONE</u>	285C2 ⁷
Denison-Sherman, Texas ⁸	244A, 269C3, 281A 285C2	244A, 269C3, 281A

and to modify license of Station KTCY to specify Pilot Point, Texas as its licensed community. In the event this request is granted, DFT will promptly file an application to modify KTCY's existing facilities to comply with the suggested reference point for the allocation of Channel 285C2 at Pilot Point.⁹

Respectfully submitted,

DAVIS FAMILY TRUST



Richard M. Riehl, Esquire
Its Attorney

HALEY, BADER & POTTS
4350 North Fairfax Drive, Suite 900
Arlington, VA 22203-1633
703/841-0606

August 16, 1993

⁷ In order to meet spacing requirements a site restriction at approximately North 33° 32' 20", West 96° 57' 15" is necessary (See Attachment A, p.2).

⁸ Denison -Sherman is generally regarded as a single market area. According to Section 73.202(b) of the Rules, 1 FM Station is assigned to Denison-Sherman, 1 is allocated to Denison and 2 are allocated to Sherman.

⁹ The suggested reference point and site restriction, North 33° 32' 20", West 96° 57' 15", is necessary to satisfy the separation requirements with Station KWNS (Ch. 285A), Winboro, Texas, Station KKDA (Ch. 283C), Dallas, Texas and Station KYYI (Ch. 284C), Burkburnett, Texas. (Attachment A, p. 2)

TECHNICAL STATEMENT IN SUPPORT
OF PROPOSED RULE MAKING TO
AMEND §73.202(b), FM TABLE OF ALLOTMENTS

on behalf of
DAVIS FAMILY TRUST
KTCY RADIO, CHANNEL 285C2

AUGUST, 1993

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WILLOUGHBY & VOSS

BROADCAST TECHNICAL CONSULTANTS
P.O. BOX 701190
SAN ANTONIO, TEXAS 78270-1190
(210) 525-1111

WILLOUGHBY & VOSS

TECHNICAL STATEMENT
IN SUPPORT OF PROPOSED RULE MAKING
BY THE DAVIS FAMILY TRUST
FOR KTCY CH.285C2-PILOT POINT, TEXAS

The firm of Willoughby & Voss has been retained by the Davis Family Trust, licensee/permittee of KTCY, FCC File No. BPH-890202IH, to prepare the instant technical statement in support of a petition for rule making to amend the FM Table of Allotments by deleting Channel 285C2 at Denison, Texas, and assigning Channel 285C2 to Pilot Point, Texas, as its first local aural service.

1. Section 1.420(i) of the FCC's Rules specify that a proposal to change community of license must result in a preferential arrangement of allotments. A preferential arrangement of allotments results when there is a net service benefit for the communities involved. Modification of FM and TV Authorizations (New Community of License), 66 R.R.2d 877, 882 (1989). As provided by Section 1.420(i), the FCC will not consider competing applications for the use of Channel 285C2 at Pilot Point, Texas, because the proposed allotment is mutually exclusive with the current allotment of Channel 285C2 at Denison, Texas. The proposed change in allotments will not deprive Denison of its only local aural service. Further, the proposed change in allotments will result in a preferential distribution of facilities under the Commission's FM allotment priorities and policies. See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989).

2. The provision of a first local aural service is the Commission's second most important FM allotment priority, co-equal with second aural service, and trails only provision of first aural service, in weight. Revision of FM Assignment Policies and Procedures, 90 F.C.C.2d 88 (1982).

Thus, the allotment of Channel 285C2 at Pilot Point, Texas, as that community's first local aural service is to be preferred over leaving the channel at Denison, Texas, as a seventh local aural service (including services licensed to Sherman, Texas). It should be noted that the communities of Denison and

WILLOUGHBY & VOSS

Sherman, Texas, are contiguous, and the stations serving one market are considered to be serving both. The Arbitron Rating service combines the two into the Sherman-Denison market and survey area.

3. The reference allotment coordinates for the instant proposed rule making meets all Class C2 distance separation requirements of Section 73.207 of the Commission's Rules. The reference coordinates are:

33 degrees, 32 minutes, 20 seconds North Latitude

96 degrees, 57 minutes, 15 seconds West Longitude

Exhibit A is a tabulation of the allocation study. These reference coordinates are 15.7 km (bearing 0.4 degrees True), from the Pilot Point, Texas, community coordinates. This site restriction is necessary to meet the distance separation requirements to KWNS Ch. 285A at Winnsboro, Texas, KKDA Ch.283C at Dallas, and KYXI Ch. 284C at Burkburnett. This proposed facility will serve all of the community of Pilot Point with the required 3.16 mV/m contour.

4. The community of Pilot Point, Texas, is an incorporated municipality, having its own Mayor and city council, a police department and provides other services to its residents. The 1990 Census figure for Pilot Point proper is 2,588. Pilot Point has its own independent school district, library and newspaper. Adoption of this proposal will provide Pilot Point with "first local aural transmission service". The allotment of Channel 285C2 to Pilot Point, Texas, will provide the community with a vital outlet for local expression.

5. The instant proposal is mutually exclusive with the present assignment of KTCY-FM to Denison, Texas. The deletion of Channel 285C2 at Denison, will still leave that community with six local services, three FM and three AM assignments.

COMMUNITY	CALL	CHAN/FREQ	FACILITY
Denison	KDSQ-FM	269/101.7 MHz	Class C3
Denison	KDSK-AM	950 KHZ	0.5 KW. DA-U
Sherman	KIKM-FM	244/96.7 MHz	Class A
Sherman	KWSM-FM	281/104.1 MHz	Class A
Sherman	KXEB-AM	910 KHZ	1.0 KW. DA-U
Sherman	KJIM-AM	1500 KHZ	1.0 KW. DA-D

WILLOUGHBY & VOSS

6. In light of the above facts, and the desire of the Commission for efficient spectrum usage, it is requested that the Table of Allotments contained in Section 73.202(b) of the Commission's Rules be amended to read as follows:

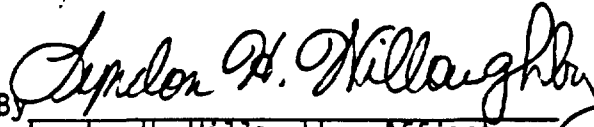
<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Denison, TX	269C3, <u>285C2</u>	269C3
Pilot Point, TX	none	<u>285C2</u>

Upon allotment of the above requested changes, formal application for the respective facility will be filed with the FCC.

CERTIFICATION

The foregoing was prepared on behalf of the Davis Family Trust, by, or under the immediate supervision of Lyndon H. Willoughby, of Willoughby & Voss, San Antonio, Texas. The affiant's qualifications are contained in previous filings and are a matter of record with the Federal Communications Commission. The statements and data contained herein are true and correct of his own knowledge, except as to statements made on information and belief and as to those statements, he believes them to be true and correct.

August 4, 1993

By 
Lyndon H. Willoughby, Affiant

Technical Consultant to:
DAVIS FAMILY TRUST

WILLOUGHBY & VOSS

FM Channel Study for Channel 285C2 at 33-32-20 96-57-15
 Safe Distance of 25.0 Kilometers
 New (6 kW) Class A spacings employed

***** STANDARD DISCLAIMER APPLIES *****

Channel	Call		City	State	Lat	Distance	Reqr'd
Applicant/Licensee					Long	Bearing	Clear
231C	KLTY	LIC	Fort Worth				
Metroplex Broadcasting, Inc.				TX	32-35-22	105.31	35.0
	98.00 kW	485M			96-58-10	180.78	70.31
231C		USED	Fort Worth				
	0.00 kW			TX	32-35-22	105.31	35.0
				OM	96-58-10	180.78	70.31
283C	KKDAFM	LIC	Dallas				
Service Broadcasting Corp.				TX	32-35-22	105.31	105.0
	98.00 kW	485M			96-58-10	180.78	0.31
283C		USED	Dallas				
	0.00 kW			TX	32-35-22	105.31	105.0
				OM	96-58-10	180.78	0.31
284A		USED	Texarkana				
	0.00 kW			AR	33-24-46	268.01	106.0
				OM	94- 4-29	92.20	162.01
284C		USED	Burkburnett				
	0.00 kW			TX	34- 5-35	188.50	188.0
				OM	98-52-44	289.56	0.50
284A		VACANT	Antlers				
	0.00 kW			OK	34-13-54	146.83	106.0
				OM	95-36- 6	58.07	40.83
284A	KTOY	LIC	Texarkana				
Jo-A1 Broadcasting, Inc.				AR	33-27-25	257.67	106.0
	3.00 kW	119M			94-10-59	91.26	151.67
284C	KYYI	LIC	Burkburnett				
Y-104 Broadcasting Company, Inc.				TX	34- 5-35	188.50	188.0
	100.00 kW	310M			98-52-44	289.56	0.50
285C2	KTCY	CP	Denison				
Sunbelt Wireless Company				TX	33-40-30	17.39	190.0
	50.00 kW	150M			96-51-40	29.75	-172.61
285A	KTMCFM	DEL	Mcalester				
Thomas H. Payne				OK	34-58- 8	192.37	166.0
	0.00 kW			OM	95-46-21	34.13	26.37
285A		USED	Winnsboro				
	0.00 kW			TX	32-56-32	166.51	166.0
				OM	95-18-53	112.97	0.51
285A		ADD	Pittsburg				
Cavalier Broadcasting				TX	33- 0-21	197.09	166.0
	0.00 kW			OM	94-56-10	106.90	31.09
285C3	NEW	APP	Dublin				
Akiva N. Gerstein				TX	32- 5-22	198.90	177.0
	4.80 kW	224M			98-12-18	216.42	21.90

KTCY-FM PRM
EXHIBIT A

WILLOUGHBY & VOSS

FM Channel Study for Channel 285C2 at 33-32-20 96-57-15
 Safe Distance of 25.0 Kilometers
 New (6 kW) Class A spacings employed

***** STANDARD DISCLAIMER APPLIES *****

Channel	Call	LIC	City	State	Lat	Distance	Regrd
Applicant/Licensee					Long	Bearing	Clear
285A	KHPA	LIC	Hope	AR	33-43-10	322.49	166.0
Newport Broadcasting Co.				91M	93-29- 7	85.48	156.49
285D	K285CN	LIC	Fort Smith	AR	35-20-45	308.29	0.0
Fred H. Baker, Jr.				OM	94-24-20	48.73	
285A	KPLE	LIC	Temple	TX	31- 3-56	277.45	166.0
KTEM Radio, Inc.				91M	97-23-57	188.81	111.45
285A	KYCXM	LIC	Mexia	TX	31-42-25	207.14	166.0
First American Broadcasting Corp.				107M	96-31-23	168.62	41.14
285C2		USED	Denison	TX	33-45-22	29.39	190.0
				OM	96-46-22	34.88	-160.61
285A	KWNS	LIC	Winnsboro	TX	32-56-32	166.51	166.0
Winnsboro Broadcasting Co., Inc.				86M	95-18-53	112.97	0.51
285A	KTMCFM	LIC	Mcalester	OK	34-58- 7	192.33	166.0
Trayne Communications, Inc.				138M	95-46-22	34.13	26.33
285A	KTCY	LIC	Denison	TX	33-42-10	40.18	166.0
Sunbelt Wireless Company				98M	96-34- 5	62.99	-125.82
285A	KNTL	LIC	Bethany	OK	35-29-58	225.88	166.0
Broadcast Equities				91M	97-37- 8	344.51	59.88
285A	KREK	LIC	Bristow	OK	35-47-11	253.40	166.0
Big Chief Broadcasting Company of Bristow				107M	96-27-35	10.16	87.40
285A		USED	Bristow	OK	35-47-11	253.40	166.0
				OM	96-27-35	10.16	87.40
285A		USED	Bethany	OK	35-29-58	225.88	166.0
				OM	97-37- 8	344.51	59.88
285A		USED	Mexia	TX	31-42-25	207.14	166.0
				OM	96-31-23	168.62	41.14
285A		USED	Mcalester	OK	34-58- 8	192.37	166.0
				OM	95-46-21	34.13	26.37

KTCY-FM PRM
EXHIBIT A

WILLOUGHBY & VOSS

FM Channel Study for Channel 285C2 at 33-32-20 96-57-15
 Safe Distance of 25.0 Kilometers
 New (6 kW) Class A spacings employed

***** STANDARD DISCLAIMER APPLIES *****

Channel Call Applicant/Licensee	City	State	Lat Long	Distance Bearing	Reqr Clear
285C3	VACANT Dublin	TX	32- 2-57 98-12-24	202.63 215.72	177.0 25.63
285A KWNF Cavalier Broadcasting	DEL Winnsboro	TX	32-56-32 95-18-53	166.51 112.97	166.0 0.51
285A	USED Hope	AR	33-43-10 93-29- 7	322.49 85.48	166.0 156.49
285C3 NEW David J. Shepherd, Individually	APP Dublin	TX	32- 5-34 98- 5-27	192.48 213.88	177.0 15.48
286A KTMC FM Thomas H. Payne	ADD McAlester	OK	34-58- 8 95-46-21	192.37 34.13	106.0 86.37
286A	USED Lindsay	OK	34-49-54 97-37-30	156.16 336.86	106.0 50.16
286A KBLP S. Cent. Okla B/Cting & Adv. Corp.	LIC Lindsay	OK	34-54- 1 97-33-56	161.18 339.71	106.0 55.18
287C	USED Dallas	TX	32-35- 7 96-58- 6	105.77 180.72	105.0 0.77
287C KYNG Alliance Broadcasting Dallas, L.P.	LIC Dallas	TX	32-35- 7 96-58- 6	105.77 180.72	105.0 0.77
288A	USED Chickasha	OK	35- 0-58 97-56-15	187.21 331.35	55.0 132.21
288A	USED Seminole	OK	35-12-53 96-44-26	186.93 5.97	55.0 131.93
288A KXXK Brewer Broadcasting Corporation	CP Chickasha	OK	35- 0-38 97-55-54	186.42 331.40	55.0 131.42
288D K288DB J and J Broadcasting	LIC Wichita Falls	TX	33-53-47 98-32-33	152.47 285.51	0.0
288A KIRC Herman L. Jones	DEL Seminole	OK	35-12-53 96-44-26	186.93 5.97	55.0 131.93

KTCY-FM PRM
EXHIBIT A

WILLOUGHBY & VOSS

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Channel	Call	City	State	Lat	Distance	Reqr'd
Applicant/Licensee				Long	Bearing	Clear

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288A	KIRC	LIC	Seminole	, OK	35-12-53	186.93 55.0
One Ten Broadcast Group, Inc.				4.60 kW 112M	96-44-26	5.97 131.93

288D	K288DB	CP MOD	Wichita Falls, etc.	, TX	33-53-47	152.47 0.0
J & J Broadcasting				0.07 kW OM	98-32-33	285.51

288A	KQXC	CP	Wichita Falls	, TX	33-53-50	152.49 55.0
Red River Communications, Inc.				3.00 kW 100M	98-32-33	285.55 97.49

288A	KXXK	LIC	Chickasha	, OK	35- 0-58	187.21 55.0
Brewer Broadcasting Corporation				3.00 kW 59M	97-56-15	331.35 132.21

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